

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. Nos. 29197, 29861, 29430, 29994 & 30064

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435], entered January 9, 2023 (the “Interim Compensation Order”), the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834], entered March 8, 2023 (the “Fee Examiner Order”), and the *Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 26404], entered October 8, 2024, (the “Confirmation Order”), those professionals listed on **Exhibit 1** to the proposed form of omnibus order (the “Proposed Order”) attached hereto as **Exhibit A** (each, an “Applicant” and together, the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

“Applicants”) filed their final fee applications [D.I. 29197 & 29861] (together, the “Final Fee Applications”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. Pursuant to the Final Fee Applications, objections to each of the Final Fee Applications, if any, were to be filed and served no later than the objection deadline set forth on each of the Final Fee Applications in accordance with the Interim Compensation Order (as applicable, the “Objection Deadline”), the last of which expired on March 25, 2025.

3. Pursuant to the Fee Examiner Order, on March 4, 2025, Katherine Stadler, (the “Fee Examiner”) filed the *Fee Examiner’s Summary Report on Final Fee Applications* [D.I. 30064] (the “Fee Examiner Report”) with respect to the Final Fee Applications, recommending the approval of the fees and expenses requested in the Final Fee Applications with certain agreed-upon reductions.

4. Prior to expiration of the Objection Deadline, Lidia Favario (“Favario”) filed the following objections: (i) the *Objection to the Final Fee Application of Sullivan & Cromwell LLP* [D.I. 29430] (ii) the *Objection to Eversheds Sutherland’s Fee Application* [D.I. 29994] (together, the “Objections”).

5. The undersigned hereby certifies that the Court’s docket has been reviewed and no other answer, objection, or other responsive pleading to the Final Fee Applications appears thereon.

6. On April 17, 2025, the Court held a hearing to consider approval of the Final Fee Applications and the Objections (the “Hearing”). Following argument at the Hearing, the Court overruled Objections to the Final Fee Applications.

7. A copy of the Proposed Order approving the Final Fee Applications has been circulated to the Fee Examiner and the Office of the United States Trustee (together, the “Parties”). The Parties have advised that they do not object to entry of the Proposed Order.

8. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

WHEREFORE the undersigned, on behalf of the FTX Recovery Trust, respectfully requests that the Proposed Order, substantially in the form attached hereto as **Exhibit A**, be entered at the Court’s earliest convenience.

Dated: April 18, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown
Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Christian P. Jensen (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
jensenc@sullcrom.com

Counsel to the FTX Recovery Trust